

# Wyoming Department of Agriculture

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Dave Freudenthal, Governor  
Jason Fearnelyhough Director

*The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.*

July 1, 2009

Bureau of Land Management, Lander Field Office  
1335 West Main St.  
Lander, WY 82520

## To Whom it May Concern:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the analysis of the Lander, Gas Hills, Shoshoni, and Boysen Reservoir Area grazing permits/leases located within the Lander Field Office (FO) of the Bureau of Land Management (BLM).

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposed project affects our agriculture industry, our natural resources, and the welfare of our citizens, it is important you continue to inform us of proposed actions and decisions and continue to provide us the opportunity to express pertinent issues and concerns.

The Lander FO intends to analyze twelve allotments for the purpose of re-issuing grazing permits/leases. Changes to these allotments will significantly impact livestock grazing permittees, agriculture producers, landowners, and other citizens, as well as our natural resources in and near each allotment.

Livestock grazing is an approved activity in each of the areas to be analyzed<sup>1</sup>. Congressional mandates, federal statutes, and implementing regulations call for multiple uses on BLM administered lands. The WDA believes the Environmental Assessments (EAs) must specifically note Congressional policy expressed in the Federal Land Policy and Management Act of 1976 (FLPMA) regarding livestock grazing. FLPMA Sec. 102(8) states "The Congress declares that it is the policy of the United States that...the public lands be managed in a manner...that will provide food and habitat for fish and wildlife and domestic animals..." Many in the public are unaware of this policy and do not understand how critical the utilization of these lands are to livestock grazing, permittees, local communities, the continued health of the resource, and the State of Wyoming.

Grazing on public lands represents a vital economic value to agricultural producers and to local communities. Proper analysis of each alternative to be presented in the corresponding EAs must include the BLM taking a "hard look" at the socio-economic impacts each alternative will have on permittees, local communities, and the state. We urge Lander FO personnel to coordinate with the University of Wyoming Department of Agriculture and Applied Economics in the College of Agriculture. Several studies conducted show how federal policies impact agriculture throughout the state. These studies

<sup>1</sup> Record of Decision for the Lander Resource Management Plan. June 1987. U.S. Department of the Interior, Bureau of Land Management.

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include the importance of Animal Unit Months (AUMs), the significance of input and output of state agriculture, and the costs and revenues to counties of agriculture compared to development. The proposed action may directly affect the continuation of livestock grazing and other agricultural operations within the planning areas, thus the BLM must include economic impacts upon agriculture in the analysis.

In addition to the economic impacts, livestock grazing represents irreplaceable environmental and social values. Domestic animals have grazed many of these areas for decades. These values and traditions contribute valuable and irreplaceable wildlife habitat, open spaces, ranchland buffers between federal lands and developments, scenic vistas, and the traditional image and heritage of the historic rural landscapes of Wyoming. Losses of these essential environmental, historic, and social values should be included by the Lander FO in the scope of the analysis.

Livestock grazing is an important management tool used to achieve desired environmental objectives in the planning area, including positive effects upon food and habitat for wildlife and livestock. The EAs need to include (1) the positive effects livestock grazing management has upon the environment and (2) how livestock grazing management assists in achieving natural resource management objectives (Anderson and Scherzinger 1975<sup>2</sup>, Derner et al. 2009<sup>3</sup>, Severson 1990<sup>4</sup>).

The Gas Hills, Boysen Reservoir, and Shoshoni Areas currently have extensive oil and gas development, with more being planned. The Lander FO must thoroughly identify and evaluate cumulative impacts of energy development in the EAs. The accumulated impacts of such projects could jeopardize the continued existence of grazing operations in these areas. These cumulative impacts may include:

- increased off- and on-road traffic and increased number of speeding vehicles
- construction of new roads
- destroyed cattle guards, cut fences and gates left open
- increased number of vehicles in the area causing death or impairments of livestock
- damaged range improvements
- decreased AUMs and pastures for grazing
- decreased palatability of vegetation and forage from road dust and development activities
- unsuccessful reclamation of disturbed areas
- introduction and spread of noxious weeds

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<sup>2</sup> Anderson, E. W. and R. J. Scherzinger. 1975. Improving quality of winter forage for elk by cattle grazing. *Journal of Range Management*. 28:120-125.

<sup>3</sup> Derner, J. D., W. K. Lauenroth, P. Stapp, and D. J. Augustine. 2009. Livestock as ecosystem engineers for grassland bird habitat in the Western Great Plains of North America. *Rangeland Ecology and Management*. 62:111-118.

<sup>4</sup> Severson, K. E. 1990. Summary: Livestock grazing as a wildlife management tool. *In: Can livestock be used as a tool to enhance wildlife habitat*. General Technical Report. RM-194 p. 3-6. U. S. Forest Service, Rocky Mountain Experiment Station, Fort Collins, CO.



The WDA appreciates the efforts of Lander FO personnel in working with livestock grazing permittees and we strongly urge this practice continue. Continued cooperation is necessary for Lander FO personnel to learn of permittee concerns and recommendations. Producers are particularly aware of how impacts will affect rangeland health, wildlife habitat, and livestock forage. They understand it is in their best interest to continue to serve as stewards of rangelands in grazing allotments and can offer recommendations that are both environmentally and economically sound. We recommend the Lander FO aggressively address the concerns and suggestions of livestock grazing permittees throughout the permit renewal/EA process. This includes ensuring grazing permittees who are directly affected receive all notices regarding these renewals.

Peer-reviewed science should underlie decisions made. The EAs need to identify the science supporting the decisions and discussions regarding this project. In addition, the WDA supports the Lander FO decision to collect data pertaining to these allotments prior to preparing the EAs and making a decision. Management decisions affecting livestock grazing use and management should reflect sufficient monitoring data.

The WDA also requests that Rangeland Management Specialists work closely with BLM Planners/NEPA Coordinators to ensure each step of the NEPA process is thorough and complete. The rationale for the decision must fully explain why the chosen option is the most suitable for each allotment and livestock grazing permittee, including how the decision will help the allotment meet or maintain Wyoming Standards for Healthy Rangelands while sustaining an economically and environmentally viable grazing management plan.

WDA supports the continuance of commercial livestock grazing on the Lander, Gas Hills, Shoshoni, and Boysen Reservoir Area grazing permits/leases. We appreciate the opportunity to comment on the scope of the proposed actions. We encourage continued attention to our concerns and look forward to hearing about and being involved in future proposed actions and decisions.

Sincerely,



Jason Fearneshough  
Director

JF/jc

CC: Governor's Planning Office  
Wyoming Association of Conservation Districts  
Wyoming Board of Agriculture  
Wyoming Farm Bureau Federation  
Wyoming Game and Fish Department  
Wyoming State Grazing Board  
Wyoming Stock Growers Association  
Wyoming Wool Growers Association